



U.S. Department of Justice

United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 14, 2021

**BY ECF**

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Sentencing adjourned to May 21, 2021 at  
11:00 a.m. The Government's sentencing  
submission is due May 14, 2021.

SO ORDERED

/s/ John G. Koeltl

April 16, 2021  
New York, NY

John G. Koeltl  
U.S.D.J.

**Re: United States v. Jaime Baez-Medina, 20 Cr. 24 (JGK)**

Dear Judge Koeltl:

A sentencing in the above-captioned case was previously scheduled for April 9, 2021, and the Government's sentencing submission was due on April 1, 2021. On March 26, 2021, the defendant filed his sentencing submission. In his submission, the defendant raised a new argument that had not previously been raised to the Government regarding the defendant's Guidelines calculation. On March 26, 2021, the Government requested a two-week adjournment of the deadline to file its sentencing submission and of the sentence in this matter. On March 30, 2021, the Court granted the request, and set the Government's sentencing submission deadline for April 16, 2021 and the sentencing for April 23, 2021.

The Government has been conferring internally regarding its response to the defendant's new argument, and the Government requires additional time to respond. Accordingly, the Government respectfully requests a three-week adjournment of its sentencing submission deadline and the sentencing. The Government has conferred with defense counsel who has no objection to this request.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

by: /s/ Rebecca T. Dell  
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cc: Amy Gallicchio, Esq. (ECF)